State of Connecticut

GEORGE C. JEPSEN ATTORNEY GENERAL



Hartford June 13, 2011

Vikram Pandit Chief Executive Officer Citigroup Inc. 399 Park Avenue New York, NY 10043 Michael Helfer General Counsel and Corp. Sec. Citigroup Inc. 399 Park Avenue New York, NY 10043

RE: Citigroup Breach

Dear Mr. Pandit and Mr. Helfner:

This letter is in reference to the recently disclosed data breach at Citigroup Inc. ("Citigroup") involving a reported intrusion into a Citigroup database, potentially exposing hundreds of thousands of consumers. The fact that personal information, such as names, account numbers and email addresses, raises concerns of potential financial fraud and targeted phishing scams. The absence of detailed information in public reports of this incident heightens my concerns for the citizens of Connecticut.

The situation raises questions about the effectiveness of Citigroup's measures to protect the confidentiality and security of private information that it receives from its customers. I am particularly interested in ensuring measures are in place to prevent the reoccurrence of breaches of this sort and to make sure that Citigroup provides sufficient protection from financial fraud to customers whose information was compromised.

Unfortunately, critical facts about the intrusion remain unclear, including details concerning the number and characteristics of impacted accounts, the cause of the breach, the steps taken to notify and protect the affected individuals, and the nature of any procedures adopted to prevent future data breaches. I therefore request that you provide answers to the questions below. Please provide responses to the following by June 22, 2011:

- 1. Please identify the total number of individuals affected by this incident, and include a state-by-state breakdown of such total.
- 2. Please describe in detail the circumstances of this breach, including, but not limited to, a timeline of the events and the "routine monitoring" Citigroup was undertaking when it discovered this breach.

- 3. Please describe what security protections, both physical and technological, were employed by Citigroup prior to the intrusion to protect the information compromised by this breach.
- 4. Please describe in detail the "enhanced procedures to prevent a recurrence of this type of event" that Citigroup publicly stated it has implemented since the discovery of this breach.
- 5. Please describe in detail all categories of personal information compromised by this breach.
- 6. Please describe all steps that Citigroup has taken to ensure that all databases and repositories storing private information are secure and have not been similarly compromised.
- 7. Please provide copies of each letter and/or email sent to affected consumers notifying them of the breach.
- 8. Please provide the date by which you expect all notification letters to be sent.
- 9. Please identify the number of complaints of unauthorized charges Citigroup has received from persons or entities affected by this breach.
- 10. Please describe Citigroup's general corporate policies regarding securing servers, databases, and information repositories containing consumers' private information, as well as all policies regarding workforce compliance therewith.

As one of the largest lending institutions in this country, Citigroup must assiduously protect the personal information it collects from its customers and employ the highest levels of data security. I expect Citigroup to fully compensate and protect any Connecticut consumers harmed as a result of this breach. To that end, I ask that Citigroup affirmatively commit to holding all affected consumers harmless relative to this breach, including the reimbursement of any out-of-pocket expenses related to the reporting of unauthorized charges or the clearing/correction of any negative credit report information.

I appreciate your cooperation in this matter and look forward to hearing from you. The information requested herein should be sent to Assistant Attorney General Matthew Fitzsimmons at 110 Sherman Street, Hartford, Connecticut 06105. Should you have any questions, you may contact AAG Fitzsimmons at 860-808-5400.

GEORGE JEPSEN